IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO

THE ESTATE OF NENA CHARLEY, by and through Personal Representative, TIMOTHY CHARLEY, TIMOTHY CHARLEY, as parent and next friend of NILE CHARLEY, and TIMOTHY CHARLEY, Individually,

Plaintiffs,

VS.

Cause No. 22-CV-33-JB-JFR

THE UNITED STATES OF AMERICA, ROBIN RANELL SALES, R.N., JOELLE CATHERIN CERO GO, R.N., AB STAFFING SOLUTIONS, LLC, a Foreign Corporation, NEXT MEDICAL STAFFING, a Foreign Corporation, and JOHN or JANE DOE Corporation.

Defendants.

NOTICE OF SUPPLEMENTAL EXHIBIT TO DOC. 131

The United States provides its supplemental Exhibit J to its Motion to Compel Discovery and Request to Find Waiver of Attorney Client Privilege. Doc. 131. As stated in the Motion, at the time of filing, the United States did not have a copy of the transcript of Mr. Charley's deposition, and stated it would supplement with relevant portions. Attached, please find the relevant portions as Exhibit J.

Respectfully submitted,

ALEXANDER M.M. UBALLEZ United States Attorney

/s/ Brett C. Eaton 10/12/23 BRETT C. EATON **Assistant United States Attorney** P.O. Box 607 Albuquerque, NM 87103 (505) 346-7274; Fax: (505) 346-7205

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CERTIFICATE OF SERVICE

I hereby certify that on October 12, 2023, I filed the foregoing electronically through the CM/ECF system which caused counsel of record to be served by electronic means as more fully reflected on the Notice of Electronic Filing.

/s/ Brett C. Eaton 10/12/23 BRETT C. EATON Assistant United States Attorney